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*Attorneys for Defendants Desert Pearl Farms, LLC,  
Peri Family Ranch, LLC, Peri & Peri, LLC,  
and Frade Ranches, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	3:73-cv-00127-MMD-WGC
	)	
Plaintiff,	)	
	)	<b>UNOPPOSED MOTION TO</b>
WALKER RIVER PAIUTE TRIBE,	)	<b>EXTEND BRIEFING SCHEDULE</b>
	)	
Plaintiff-Intervenor,	)	
	)	
v.	)	
	)	
WALKER RIVER IRRIGATION DISTRICT,	)	
a corporation, et al.,	)	
	)	
Defendants.	)	
	)	

Pursuant to LR IA 6-1 and LR 26-4, Defendants Desert Pearl Farms, LLC, Peri Family Ranch, LLC, Peri & Peri, LLC, and Frade Ranches, Inc. (collectively, “Peri”), joined by the other Principal Defendants named in this matter, hereby move to extend the briefing schedule for the *Joint Motion for Judgment on the Pleadings* (the “Joint Motion”) [Doc. No. 2606] filed February 20, 2020 by the United States of America and the Walker River Paiute Tribe. Specifically, Peri and the Principal Defendants seek a sixty-day extension, from May 20, 2020 to July 20, 2020, to respond to the Joint Motion.

This Motion is made and based on the following Memorandum of Points and Authorities and is unopposed.

**MEMORANDUM OF POINTS AND AUTHORITIES**

The United States of America and the Walker River Paiute Tribe filed the Joint Motion [Doc. No. 2606] on February 20, 2020, seeking judgment on the pleadings with respect to certain of the Principal Defendants' affirmative defenses.

On February 27, 2020, this Court entered the *Stipulation and Order Confirming Schedule and Related Matters for Responses and Replies with Respect to Joint Motion for Judgment on the Pleadings* (the "Briefing Order") [Doc. No. 2608]. The Briefing Order states that "[r]esponses to the Joint Motion will be due within 90 days of its service." Briefing Order at p. 2. As a result, responses to the Joint Motion are currently due May 20, 2020. The Briefing Order further requires the Principal Defendants to coordinate their respective responses and file a single brief, to the extent feasible, on common issues. *See id.* at 3. The Principal Defendants must accordingly prepare and coordinate their responses and, if feasible, file a joint response on common issues no later than May 20, 2020.

Since entry of the Briefing Order, the Covid 19 (Novel Coronavirus) pandemic has resulted in several emergency orders being issued in both the State of California and the State of Nevada, where counsel for the Principal Defendants live and work. These emergency orders, as well as other voluntary protective measures being taken in response to the pandemic, have disrupted the normal operations of law offices. These disruptions have included limiting (or closing) office operations, cancelling in-person meetings, and directing attorneys and staff to work from home if possible. These disruptions make it extraordinarily difficult for the Principal Defendants to prepare and coordinate their response to the Joint Motion. Accordingly, the Principal Defendants seek additional time to respond to the Joint Motion so they may adequately prepare and coordinate their response. The Principal Defendants contacted counsel for the United States and the Walker River Paiute Tribe, and they do not oppose the requested sixty-day extension.

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 23rd day of March, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record who are registered with the ECF system. Further, pursuant to the Superseding Order Regarding Service and Filing in Subproceeding C-125-B on and by All Parties [Doc. No. 2100], the foregoing document does not affect the rights of others and does not raise significant issues of law or fact. Therefore, neither Peri nor the Principal Defendants have taken steps to serve notice of this document via postcard service.

/s/ Brad M. Johnston

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